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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------|---|---------------------------------------|
| UNITED STATES OF AMERICA, |) | CASE NO. CR 15-00529 CRB |
| |) | |
| Plaintiff, |) | UNITED STATES' SECOND REVISED EXHIBIT |
| |) | LIST |
| v. |) | |
| |) | |
| WING WO MA, et al., |) | Trial Date: October 15, 2019 |
| |) | Pretrial Date: October 1, 2019 |
| Defendant. |) | Court: Hon. Charles R. Breyer |

The United States hereby submits its second revised exhibit list of exhibits the United States may offer in its case-in-chief. The United States reserves the right to modify this list as necessary.

Dated: September 12, 2019

Respectfully submitted,

DAVID L. ANDERSON
United States Attorney

/s/
CHRISTIAAN HIGHSMITH
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Assistant United States Attorneys

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No.: CR 15-00529 CRB Date: _____
United States of America vs. Wing Wo Ma, et al.

GOVERNMENT'S REVISED EXHIBIT LIST

(X) Plaintiff

() Defendant

| Exhibit Number | Description | Date | |
|----------------|---|---------------------------|----------------------|
| | | Marked for Identification | Admitted in Evidence |
| 1 | (510) 590-6098 (Wing Wo Ma) A. Subscriber Information B. Call Detail C. Call Detail D. Location Information (WM-042725-WM-045623) | | |
| 2 | (415) 286-2383 (Jim Tat Kong) A. Subscriber Information B. Call Detail Instructions C. Call Detail (WM-042725-WM-045623) | | |
| 3 | (510) 703-0929 (Jim Tat Kong) A. Subscriber Information B. Call Detail C. Call Detail D. Call Detail E. Location Information (WM-042725-WM-045623) | | |
| 4 | (415) 819-6821 (Cindy Chen) A. Subscriber Information B. Call Detail C. Call Detail D. Call Detail E. Location Information (WM-042725-WM-045623) | | |
| 5 | (415) 819-6823 (Cindy Chen) A. Subscriber Information B. Call Detail C. Call Detail D. Call Detail (WM-042725-WM-045623) | | |

| Exhibit Number | Description | Date | |
|----------------|---|---------------------------|----------------------|
| | | Marked for Identification | Admitted in Evidence |
| 6 | (510) 301-1600 (Jeffrey Huynh) A. Subscriber Information B. Call Detail (10/7/13 thru 10/30/13) C. Call Detail (10/1/13 thru 11/7/13) (WM-042725-WM-045623) | | |
| 7 | (415) 306-2047 (Kevin Luu) A. Subscriber Information B. Call Detail C. Call Detail D. Call Detail E. Location Information (WM-042725-WM-045623) | | |
| 8 | (415) 385-5293 (Kevin Luu) A. Subscriber Information B. Device I.D. C. Call Detail D. Call Detail (WM-042725-WM-045623) | | |
| 9 | (415) 697-9915 (Kevin Luu) A. Subscriber Information B. Call Detail C. Call Detail D. Call Detail E. Location Information (WM-042725-WM-045623) | | |
| 10 | (415) 533-6163 (Eric Zhen) A. Subscriber Information B. Call Detail C. Call Detail D. Call Detail (WM-042725-WM-045623) | | |
| 14 | (714) 769-0973 (Chanh Hoang) A. Subscriber Information B. Call Detail (WM-042725-WM-045623) | | |
| 16 | Wing Wo Ma iPhone 4s 510.590.6098 (WM-050115) Cellbrite download S/N: C8PMT1MRFML8 | | |
| 17 | Wing Wo Ma Samsung SGH-A117 510.590.6098 (WM-050116) Logical Extraction report (1B73) | | |
| 18 | Wing Wo Ma iPhone 4s 510.590.6098 (WM-050117) S/N: C8PMT1MRFML8 Back-up Extraction Report | | |
| 19 | Wing Wo Ma iPhone 4s 510.590.6098 (WM-050118) S/N: C8PMT1MRFML8 Logical Extraction report (1B71) | | |
| 20 | Jim Tat Kong iPhone 5 (510) 703-0929 (1A31) S/N: DNTK1JR6DTTN (WM-000122) | | |

| Exhibit Number | Description | Date | |
|----------------|---|---------------------------|----------------------|
| | | Marked for Identification | Admitted in Evidence |
| 21 | Jim Tat Kong Motorola Razor (415) 286-2383 (SW10A) (WM-000123) | | |
| 22 | Cindy Chen iPhone 5 (415) 819-6823 S/N C39K4YG6DTTP (WM-000124) | | |
| 25 | Cigarette butt by passenger door (1B23) | | |
| 26 | Cigarette butt by passenger door | | |
| 27 | Cigarette butt by passenger door | | |
| 28 | Cigarette butt by passenger door | | |
| 31 | Shell casing from Jim Tat Kong's body | | |
| 32 | Jim Tat Kong's baseball hat | | |
| 33 | \$1,029 and flashlight, Jim Tat Kong's pocket | | |
| 34 | Receipt from cash in SW3 | | |
| 36 | Bank of America envelope from Jim Tat Kong's inside jacket pocket | | |
| 38 | Cindy Chen's blanket | | |
| 41 | Black purse | | |
| 41A | Cash receipt from purse for \$3,912 | | |
| 42 | Credit cards and money orders | | |
| 43 | Motorola flip phone | | |
| 44 | Apple iPhone | | |
| 45 | Apple iPhone | | |
| 46 | Spent round on pass front center console | | |
| 47 | Spent casing from rear passenger floor | | |
| 48 | Swab from back of passenger headrest | | |

| Exhibit Number | Description | Date | |
|----------------|---|---------------------------|----------------------|
| | | Marked for Identification | Admitted in Evidence |
| 49 | Swab from passenger side B pillar | | |
| 50 | Swab from right hand driver's headrest | | |
| 52 | Swab of water bottle | | |
| 54 | Northface backpack from third row seat in minivan | | |
| 55 | Plastic bag "Golden Nugget" | | |
| 56 | Cash receipt: \$19,310 | | |
| 57 | White plastic bag "Wynn" casino | | |
| 58 | Cash receipt: \$20,000 | | |
| 59 | U.S. Priority Mail envelope says "35K" | | |
| 60 | Cash receipt: \$15,000 | | |
| 61 | U.S. Priority Mail envelope | | |
| 62 | Cash receipt: \$26,000 | | |
| 63 | Documents from behind driver seat: urban farm receipts for \$30k worth of marijuana grow equipment | | |
| 66 | Contents from between front seat and console: indicia Jim Tat Kong 1523 Miller Ave, garden supply receipts, Clifton Leung investment note; car repair receipts; hydroponic receipts | | |
| 67 | Lower glove box: Cindy Chen Sapphire credit card 4147 2021 2406 8881 account statements; misc. indicia; Dr. Lam indicia, Sheng Yang indicia; checking account number BOA 0279632372 | | |
| 68 | Upper glove box: receipt for \$360 cash | | |
| 84 | Bullet from V2 mouth | | |
| 87 | Latent fingerprint card V2 | | |
| 88 | Vials of blood from V2 heart | | |
| 92 | Rolex V1 right wrist | | |

| Exhibit Number | Description | Date | |
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| | | Marked for Identification | Admitted in Evidence |
| 101 | Latent fingerprint card V1 | | |
| 102 | Reference card V1 blood | | |
| 104 | X-rays V1 and V2 | | |
| 106 | Indicia, laminate card: Mark Ma | | |
| 107 | White iPhone 4s C8PMT1MRFML8 | | |
| 108 | HP laptop CNF0471BBG | | |
| 109 | ASUS webbook laptop | | |
| 110 | Fort Bragg papers and receipts: including Luu marijuana recommendation, multiple other marijuana recommendation, FBCR papers, map with Hwy 20 highlighted, receipts in Huynh name; Nevin Chea ID, Road D illegal greenhouse notice to Dr. Lam | | |
| 111 | Black laptop bag with binders and papers: FBCR papers and horticultural papers | | |
| 112 | Black Samsung phone on top of dresser near Wing Wo Ma IDs | | |
| 113 | iPad | | |
| 114 | Samsung phone | | |
| 115 | Black Toshiba tablet | | |
| 116 | Wing Wo Ma indicia: cannabis recommendation and three licenses | | |
| 117 | Samsung phone RFMB819522H | | |
| 118 | Samsung Black RV3A7555311A | | |
| 119 | Olympus digital camera | | |
| 120 | Polaroid digital camera | | |
| 121 | Sony laptop PCG-3DYL | | |
| 122 | HP computer tower | | |
| 123 | DVR 8401409BOX00469 | | |

| Exhibit Number | Description | Date | |
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| | | Marked for Identification | Admitted in Evidence |
| 124 | Bag of .45 caliber shell casings | | |
| 125 | Bag of 9mm shell casings | | |
| 126 | Single 1GB micro SD card | | |
| 127 | AT&T sim card | | |
| 128 | Back silver canon digital camera | | |
| 129 | Indicia from Road D, Nevin Chea and Thinh Vinh Tran | | |
| 130 | 150 vegetative marijuana plants | | |
| 131 | 1.55 pounds bud marijuana | | |
| 133 | Indicia Nevin Chea | | |
| 138 | Indicia: Thinh tran | | |
| 141 | Nevin Chea passport | | |
| 154 | Item 9 -- letter from Mendocino County to Dr. Lam from water district; misc. indicia Road D | | |
| 161 | Item 16 – Internet printout of 7191 W. Dry Creek, Healdsburg, CA. Google map of 7191 W. Dry Creek Rd., Healdsburg, CA and handwritten note on back listing materials and prices for building a greenhouse. | | |
| 165 | Item 20 – Handwritten note “Nevin Chea,” Chase bank account 158271250 | | |
| 168 | Check in document Surf Motel | | |
| 169 | Credit card document Surf Motel | | |
| 170 | DMV Photo: Jim Tat Kong (WM-048091 & WM-050813 – WM-050814) | | |
| 171 | DMV Photo: Cindy Chen (WM-048092) | | |
| 177 | DMV Photo: Ma Wing Wo (WM-048094) | | |
| 179 | DMV Photo: Nevin Chea (WM-048103) | | |
| 180 | DMV Photo: Thinh Vinh Tran (WM-048098) | | |

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| | | Marked for Identification | Admitted in Evidence |
| 183 | DMV Photo: Kevin Luu (WM-048093) | | |
| 184 | DMV Photo: Eric Michael Zhen (GJ000412) | | |
| 186 | Surf Motel room key | | |
| 187 | Fort Bragg Community Resort Book | | |
| 188 | Surf Motel surveillance footage #1 (WM-000126) | | |
| 189 | Overflight photos and video | | |
| 190 | CD with video surveillance footage (Angelina's) A – WM-050016 B – WM-050017 | | |
| 191 | Real estate financial documents (WM-000597 – WM-001371) | | |
| 192 | Documents, emails, and intelligence from Alameda County Sheriff's Office A – Emails (WM-040914 – WM-040918) B – Attachments (WM-040892 – WM-040893) | | |
| 193 | Surf Motel surveillance footage #2 (WM-000125) | | |
| 194 | RCFL download of seized electronics SVE049649 | | |
| 195 | \$7.29 U.S. currency | | |
| 196 | Five checks from V1 Coach purse | | |
| 197 | \$1.43 U.S. currency | | |
| 198 | Credit cards Cindy Chen: Five total | | |
| 199 | Two checks found in V1 jacket pocket | | |
| 200 | Sapphire credit card Jim Tat Kong | | |
| 201 | 16 money orders and BOA checks | | |
| 203 | \$1.01 seized from Jim Tat Kong pocket | | |
| 204 | Black binder re marijuana business | | |
| 211 | Jeffrey Huynh buccal swab | | |

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| 212 | DNA secondary evidence | | |
| 213 | Wing Wo Ma buccal swab | | |
| 221 | Materials provided by Wing Wo Ma to ACSO, including map with areas circled | | |
| 223 | Photos of Crime Scene A - (WM-000131 – WM-000296) B - (WM-000370 – WM-000596) C - (WM-050410 – WM-050417) Satellite images of scene | | |
| 224 | Photos of Autopsies VI – Cindy Chen (WM-000297 – WM-000335) V2 – Jim Tat Kong (WM-000336 – WM-000368) | | |
| 225 | Photos of Toyota Sienna (WM-002304 – WM-002386) | | |
| 226 | Photos of Surf Motel | | |
| 227 | Photos of 1401 Road D (July, 2013) (USA-000006) | | |
| 228 | Photos of Road D (October, 2013) (USA-000005) | | |
| 231 | Kristina Rosenfeld, Calif. DOJ Criminalist A – CV (WM-046643 – WM-046644) B – Report & notes 9/15/16 (WM-046645 – WM-046649) | | |
| 232 | Jeanette Wentworth, FBI Nuclear DNA Unit A – CV (WM-049003 – WM-049005) B – Report 1/13/14 (WM-002936 – WM-002939) C – Report 2/12/14 (WM-048981 – WM-048986) D – Report 4/14/14 (WM-003095 – WM-003097) | | |
| 234 | Ashley Parish, FBI Latent Print Unit A – CV (WM-048342 – WM-048344) B – Report 4/17/14 (WM-003103 – WM-003109) | | |
| 235 | Linda S. Graham, Calif. DOJ Latent Print Analyst A – CV (WM-049137 – WM-049139) B – Report 10/21/13 (WM-040956 – WM-040957) C – Report 12/2/13 (WM-040958 – WM-040959) D – Report 01/13/14 (WM-040960 – WM-040961) E – Case Notes and photos (WM-049459 – WM-049610) F – Report 12/8/17 (WM-050705 – WM-050706) | | |
| 236 | Casseday Baker, SERI Forensic Serologist A – CV (WM-049135 – WM-049136) B – Report & Notes (WM-049611 – WM-049666) | | |
| 237 | John Webb, FBI Firearms/Toolmark Unit A – CV (WM-048599) B – Report 6/10/14 (WM-003117 – WM-003122) | | |

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| 238 | Andrew Alvarado, MCDA Cellular Phone Forensics A – CV (WM-049145 – WM-049148) | | |
| 239 | Chad Fitzgerald, FBI CAST Unit A – CV (WM-049140) B – Cellular Analysis Survey Team (CAST) Analysis | | |
| 241 | Jacqueline Benjamin, Medical Examiner A – CV (WM-049141 – WM-049144) | | |
| 242 | DNA Buccal Swabs: (a) Wing Wo Ma, (b) James Tat Kong, (c) Cindy Chen, (d) Kevin Luu, (e) Eric Zhen, (f) Jeffrey Huynh, (g) Chanh Hoang | | |
| 243 | Wing Wo Ma 10/22/2013 Interview: (a) transcript; (b) video recording; (c)-(n) excerpts of video A – (WM-047511 – WM-047606) (WM-050833 – WM-050948) B – (WM-045632 and WM-045633) C – N Excerpts | | |
| 244 | Wing Wo Ma 10/22/2015 Interview: (a) transcript; (b) video recording; (c)-(n) excerpts of video A – (WM-041800 – WM-041969) B – (USA-000009) C – N Excerpts | | |
| 245 | Chanh Hoang statements: (a) 7/20/2015 interview transcript; (b) 12/20/2015 interview transcript A - (WM-046665 – WM-046755) B - (WM-046756 – WM-046814) | | |
| 247 | Jeffrey Huynh statements: (a) 10/25/2013 interview transcript; (b) 10/22/2015 interview transcript A - (WM-046850 – WM-047003) B - (WM-047608 – WM-047714) | | |
| 248 | Karen Parker interview transcript (WM-047004 – WM-047017) | | |
| 249 | Kevin Luu statements: (a) 10/25/2013 interview transcript; (b) 01/09/2014 interview transcript; (c) 10/22/2015 interview transcript; (d) 3/30/2017 grand jury transcript A - (WM-047018 – WM-047101) B - (WM-047102 – WM-047209) C - (WM-042080 – WM-042315) D - (GJ000470 – GJ000524) | | |
| 250 | Kin San Chan interview transcript (10/22/2013) (WM-047213 – WM-047260) | | |
| 251 | Paul Ancajima statements: (a) 10/23/2013 interview transcript; (b) 11/21/2013 interview transcript A – (WM-047288 – WM-047346) B – (WM-047347 – WM-047464) | | |

| Exhibit Number | Description | Date | |
|----------------|--|---------------------------|----------------------|
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| 252 | Paul Clark interview transcript (10/23/2013) (WM-047465 – WM-047502) | | |
| 253 | Search Warrant photos Wing Wo Ma Residence 10/22/15 (WM-049667 – WM-050013) | | |
| 254 | Newspaper articles: (a) Santa Rosa Press Democrat; (b) Anderson Valley Advertiser; (c) Fort Bragg Advocate News; (d) Ukiah Daily; and (e) Willits News A - (WM-050300, WM-050302 – WM-050307) B - (WM-050394 – WM-050397) C - (WM-050398 – WM-050399) D - (WM-050400 – WM-050406) E - (WM-050407 – WM-050409) | | |
| 255 | Styrofoam head (male) | | |
| 256 | Styrofoam head (female) | | |
| 257 | Hertz Rent a Car paperwork (WM-050348 – WM-050356) | | |
| 258 | Casseday Baker, SERI Forensic Serologist A – CV (WM-049135 – WM-049136) B – 12/4/2017 Report & Notes (WM-050358 – WM-050393) | | |
| 259 | Wing Wo Ma Jail call 4-5-17 thru 7-5-17: (a) transcript; and (b) audio disc A - (WM-050308 – WM-050311) B – (WM-050357) | | |
| 260 | DMV Photo: Jeffrey Huynh (GJ000381) | | |
| 261 | DMV Photo: Chanh Hoang (GJ000380) | | |
| 262 | Photographs of 10/22/13 Mendocino County overflight of 1401 Road D and Highway 20 homicide scene (WM-050815 - WM-050832) | | |
| 263 | Photographs of Fort Bragg area taken 12/12/17 (WM-050730 - WM-050812) | | |
| 264 | Recordings of Harry Hu | | |
| 265 | Noelle Mah emails | | |
| 266 | Harry Hu life insurance records | | |
| 267 | Immigration Letter by Harry Hu | | |
| 268 | Photos of Fire Investigation of Ma's Workplace | | |

| Exhibit Number | Description | Date | |
|-------------------|--|------------------------------|-------------------------|
| | | Marked for Identification | Admitted in Evidence |
| 269 | OPD Report Re: Fire at Ma's Workplace | | |
| 270 | Video of Lt. Andy Porter with Minivan | | |
| 271 | Blood Samples from Minivan | | |
| 272 | ERT Photographs of Minivan | | |
| 273 | Photos of Blood Spatter from Minivan | | |
| 274 | English Language Transcripts of Victim Text Messages | | |